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STATE OF KANSAS



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PRMT SECTION

DEPARTMENT OF HEALTH AND ENVIRONMENT

Forbes Field Topeka, Kansas 66620-0001 Phone (913) 296-1500

Mike Hayden, Governor

Stanley C. Grant, Ph.D., Secretary Gary K. Hulett, Ph.D., Under Secretary

April 21, 1989

Mr. Richard S. Hendey, Jr.
Manager, Regional Environmental Affairs
Olin Corporation
P.O. Box 1355
Stamford, Connecticut 06904-1355

Re: RCRA Financial Assurance Kansas City, Kansas Facility EPA I.D. Number KSD000203638

Dear Mr. Hendey:

The financial test documentation submitted on March 29, 1989 by Olin Corporation for the purpose of demonstrating RCRA financial assurance for closure costs and liability coverage at the Kansas City, Kansas plant has been reviewed.

The closure cost estimate submitted for this facility in the chief financial officer's letter did not appear to be increased enough to account for inflation. My calculations using an inflation factor derived per 40 CFR 264.142(b) and last year's closure cost estimate placed the closure cost at an amount higher than your figure of \$51,480. Please provide calculations showing how Olin arrived at this figure. We will not consider Olin to be in full compliance with 40 CFR 264 Subpart H requirements until the updated closure cost used in the financial test demonstration has been approved.



RCRA Records Center

Mr. Richard S. Hendey, Jr. April 21, 1989
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Please submit this information by <u>May 19, 1989</u>. If the closure cost is adjusted please revise the letter from the chief financial officer accordingly. Any questions regarding this matter should be directed to me at (913) 296-1612.

Sincerely,

Brenda Clark

Environmental Engineer Hazardous Waste Section Bureau of Waste Management

Brenda Clark

df/hendey.bc

C Jim Fischer Rita Huff